

March 6, 2023

Honorable Brian M. Cogan
United States District Judge for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York, 11201

Re: United States v. Afrasiabi, 21 Cr. 46 (BMC)

Your Honor:

I write in response to the Court's Order of today, March 6, 2023, setting jury selection in this case for October 23, 2023. Such a schedule would cause me some hardship as I am scheduled for trial before the Hon. Jennifer G. Zipp in the District of Arizona on the case of *United States v. Ahmed Mahad Mohamed*, 19 Cr. 2162 (JGZ). The matter in Arizona is a two-defendant case and both clients are detained in Tucson, Arizona. The COVID-19 pandemic postponed trial in the case, but we now have a firm trial date of October 30, 2023.

In light of the trial conflict, I respectfully request the Court set Mr. Afrasiabi's trial for a date after November 30, 2023. I apologize for any inconvenience caused to the parties and to the Court by this request. Should there be a plea in the *Mohamed* matter, that would allow me to try the *Afrasiabi* case on October 23, 2023 I would promptly advise this Court.

I thank the Court for its time and consideration.

Respectfully submitted,

/s/Sabrina P. Shroff
Stand By Counsel to Mr. Afrasiabi